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**2013 Annual Progress Report and
Master Schedule Update
Revision 0**

**Remedial Investigation/Feasibility Study
Peoples Gas Light and Coke Company
Former Manufactured Gas Plant Sites**

Project No: 1982

October 31, 2013

US EPA RECORDS CENTER REGION 5



512762



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Mr. Ross del Rosario
Remedial Project Managers
USEPA, Region 5
77 W. Jackson Boulevard
Chicago, IL 60604-3590

October 31, 2013
(1982/7.0a)

RE: 2013 Annual Progress Report and Master Schedule Update – Revision 0
Peoples Gas Light and Coke Company's Former Manufactured Gas Plant Sites
CERCLA Docket No.: V-W-08-C-917

Dear Mr. del Rosario:

On behalf of Integrys Business Support, LLC (IBS), managing Peoples Gas Light and Coke Company's (PGL) former manufactured gas plant (MGP) sites, please find enclosed two hard copies of the 2013 Annual Progress Report and Master Schedule Update for the Chicago sites. This report summarizes activities performed between October 31, 2012 and October 31, 2013 and provides a proposed schedule for future activities.

This 2013 Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PGL, effective October 31, 2008.

Please do not hesitate to contact Mr. Naren Prasad (IBS) at 312.240.4569 if you have any questions regarding this document.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

Handwritten signature of Jennifer M. Hagen in black ink.

Jennifer M. Hagen, PE
Senior Engineer

Handwritten signature of Laurie L. Parsons in black ink.

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cc: Mr. Brian Bartoszek, IBS (email only)
Mr. Naren Prasad, IBS (email only)
Mr. Doyle Wilson, IEPA (hard copy and CD copy)
Mr. Dave Klatt, USEPA Contractor – CH2MHill (hard copy and CD copy)

1982 PGL Annual Progress and Schedule Update R del Rosario trans 121031

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FIGURES

Figure 1 Master Schedule

ACRONYMS

| | |
|-------|---|
| ARAR | Applicable or Relevant and Appropriate Requirements |
| BMc | Burns and McDonnell |
| CSM | Generalized Conceptual Site Model |
| FS | Feasibility Study |
| FSP | Field Sampling Plan |
| HASP | Health and Safety Plan |
| IEPA | Illinois Environmental Protection Agency |
| IBS | Integrys Business Support, LLC |
| MGP | Manufactured Gas Plant |
| NRT | Natural Resource Technology, Inc |
| OU | Operable Unit |
| PGL | Peoples Gas Light and Coke Company |
| QAPP | Quality Assurance Project Plan |
| RAF | Risk Assessment Framework |
| ROD | Record of Decision |
| RI | Remedial Investigation |
| RPM | Remedial Project Manager |
| SOW | Statement of Work |
| SSWP | Site-Specific Work Plan |
| USEPA | U S Environmental Protection Agency |

1 INTRODUCTION

1.1 Scope

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U S Environmental Protection Agency (USEPA) and Peoples Gas Light and Coke Company (PGL), a subsidiary of Integrys Energy Group, effective October 31, 2008 (2008c). Also included in this report is a Master Schedule Update that includes the general schedule for Remedial Investigation/Feasibility Study (RI/FS) activities at each Site. The Annual Progress Report and Master Schedule Update address PGL's former manufactured gas plant (MGP) Sites located in Chicago, Illinois. The sites include: Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit (OU), North Station OU, and Willow Street-Hawthorne Avenue Station OU), North Shore Avenue Station, and South Branch Site (consisting of 22nd Street Station Upland OU, Hough Place Station Upland OU, South Station Upland OU, Throop Street Station OU and South Branch River OU). Integrys Business Support, LLC (IBS) manages the former MGP sites for PGL.

1.2 Overview

This report addresses the following

Section 2: Multi-Site Document Progress

Section 3: Site Progress

Section 4: Proposed Master Schedule

Section 5: References

2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site RI documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site FS Support Document is used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

2.1 Multi-Site RI Documents

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008. The Multi-Site RI Documents set forth a consistent approach for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- Multi-Site Quality Assurance Project Plan – Revision 2, September 4, 2007 (QAPP, 2007(c))
- Multi-Site Health and Safety Plan – Revision 2, August 2, 2007 (HASP, 2007(a))
- Generalized Conceptual Site Model – Revision 0, August 5, 2007 (CSM, 2007(b))
- Multi-Site Risk Assessment Framework – Revision 0, September 5, 2007 (RAF, 2007(d))
- Multi-Site Field Sampling Plan – Revision 4, September 8, 2008 (FSP, 2008(b))

Site-Specific Work Plans (SSWPs) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into the baseline risk assessment.

2.2 Multi-Site FS Support Document

USEPA has approved (USEPA, 2010(c)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(c)). The Multi-Site FS Support Document includes general response actions.

and preliminary remedial technologies for Integrys Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead

SOW Section 1.2.2 discusses the Multi-Site FS Support Document which includes:

- Preliminary Remedial Technology Screening
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document

2.3 Multi-Site Document Status

A Multi-Site RAF Addendum was submitted to the USEPA on April 20, 2011 (Exponent, 2011(b)) to incorporate the Regional Screening Levels (RSLs) into the hierarchy for human health screening levels and to further develop the approach to assessing potential vapor intrusion issues. Multi-Site RAF Addendum, Revision 1, was submitted to USEPA on March 28, 2013. USEPA provided comments on April 22, 2013. It was mutually agreed that the revised document would be issued following revisions to the Regional Screening Levels (RSLs) in June 2013 and to allow additional time for Illinois Environmental Protection Agency (IEPA) to provide comments on the Multi-Site RAF Addendum Revision 1. IEPA provided comments to USEPA on July 1, 2013. Prior to developing Multi-Site RAF Addendum Revision 2, IBS submitted responses to Agency comments on August 12, 2013 and USEPA provided additional responses on August 26, 2013. Multi-Site RAF Addendum Revision 2 will be submitted in November 2013.

2.4 Multi-Site Meetings

During this reporting period, two multi-site technical meetings were conducted with USEPA, IBS, and NRT to discuss a specific technical issue.

The first technical meeting was held on August 27, 2013 to discuss the strategic schedule of the PGL, NSG, and WPSC MGPs to set goals for Records of Decisions (ROD). The second multi-site technical meeting was held on September 24, 2013 to discuss the objectives and highlights of the multi-site approach with the new Remedial Project Manager for the Pitney Court Station.

Site specific meetings were held as discussed in Section 3

3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). Project start dates were established for the North Branch Site – Division Street Station OU, South Branch Site – South Station Upland OU, North Shore Avenue Station Site, and Crawford Station Site. Start dates for the remaining OUs were to be initiated every six months, or as otherwise mutually agreed upon.

The priority of the sites has been modified from the sites identified in the SOW. At this time, the South Station Upland OU (South Branch Site), Division Street Station OU (North Branch Site), Willow Street-Hawthorne Avenue Station OU (in lieu of North Shore Avenue Site), North Station (North Branch Site), Crawford Station Site, Throop Street Station Upland OU (South Branch Site), Hough Place Station Upland OU (South Branch Site), and Pitney Court Station Upland OU (South Branch Site) have been initiated. The remaining sites have not been initiated. In addition to the RI/FS phase, a Time-Critical Removal Action has been initiated at the Crawford Station Site.

The North Branch Sites – Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU were initiated on November 25, 2008, April 28, 2009, and June 15, 2011, respectively, with submittal of the Completion Reports. The South Branch Sites – South Station Upland OU and Throop Street Station Upland OU were initiated on May 13, 2008 and June 20, 2012, respectively, with submittal of the Completion Reports. The South Branch Sites – Hough Place Station Upland OU and Pitney Court Station Upland OU were initiated on March 15, 2013 and August 30, 2013, respectively, with submittal of the Completion Report with SSWP because remediation has been performed at these sites. The Crawford Station Site RI/FS was initiated on December 23, 2011 with submittal of the Completion Report. The AOC for a Time-Critical Removal Action for Crawford Station Site was signed on October 13, 2011. Progress on the Time-Critical Removal Action is discussed in weekly progress reports submitted to USEPA and is not included in this RI/FS AOC Annual Progress Report.

RI planning and field activities have been performed as summarized in the following sections during this reporting period. A removal action was contemplated at South Station Upland OU, but not initiated. As discussed above, Time-Critical Removal Actions have been performed at the Crawford Station during this reporting period.

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the MGP sites. As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated October 31, 2012 (2012(ai))) is compared to the actual progress.

3.1 Overview Progress Meetings

A program overview meeting was not held during this time period. As discussed in Section 2.4, multi-site meetings were held on August 27, 2013 to discuss site schedules and on September 24, 2013 to discuss the objectives and highlights of the multi-site approach with the new Remedial Project Manager for the Pitney Court Station.

3.2 South Station Upland OU (South Branch Site)

The Project Start Date for the South Station Upland OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)). However, Completion Report – Revision 0 was submitted on May 13, 2008 (2008(a)), prior to finalizing the Settlement Agreement. Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Station Upland OU site-specific documents.

On September 13, 2011 (2011f), USEPA modified the Settlement Agreement to modify the site boundaries of the South Station Upland OU. The modification excluded Parcels C and D from the Settlement Agreement because review of existing data indicates the source removal has been complete and no further remedial action is planned or anticipated on these parcels.

On September 24, 2013, the potential for implementing a removal action at the South Station Upland OU was discussed. Following the meeting, it was decided the South Station Upland OU would not proceed as a removal action and additional vapor intrusion assessments should be performed.

3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals, related to the RI/FS AOC, were not prepared for the South Station Upland OU during this reporting period because a removal action was contemplated, as discussed above, which would affect the scope of additional assessments. Therefore, the Technical Memorandum for additional assessments related to vapor intrusion was not submitted.

Similarly, the RI Report – Revision 0, Alternatives Array Technical Memorandum, and FS Report – Revision 0 were not submitted.

On May 9, 2013, USEPA provided comments on a data validation package. On June 25, 2013, USEPA provided clarification that the comments were related to the April 2011 data validation package and on August 20, 2013, IBS provided a response to the comments.

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009(a)) were initiated in May 2009. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

| Task | Targeted Completion Date | Actual Completion Date |
|--|--------------------------|------------------------|
| Twelfth Groundwater Monitoring Event (Fifth for wells installed in Sept. 2011) | January 2013 | January 22-25, 2013 |
| Thirteenth Groundwater Monitoring Event | April 2013 | April 23-24, 2013 |
| Fourteenth Groundwater Monitoring Event | July 2013 | July 7-15, 2013 |
| Fifteenth Groundwater Monitoring Event | October 2013 | October 21-22, 2013 |

3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2012 | November 13, 2012 |
| November 2012 | December 13, 2012 |
| December 2012 | January 15, 2013 |
| January 2013 | February 15, 2013 |
| February 2013 | March 14, 2013 |
| March 2013 | April 15, 2013 |
| April 2013 | May 14, 2013 |
| May 2013 | June 14, 2013 |
| June 2013 | July 15, 2013 |
| July 2013 | August 14, 2013 |
| August 2013 | September 16, 2013 |
| September 2013 | October 15, 2013 |

3.3 Division Street Station OU (North Branch Site)

The Project Start Date for the Division Street Station OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)) but was re-established to November 25, 2008. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. No scoping meetings or conference calls were held during this reporting period.

3.3.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table:

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|------------------------------|--------------------------------|--------------------------|
| Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 1 (addressing USEPA's October 11, 2012 comments) | November 2012 | November 26, 2012 | December 13, 2012 |
| Resubmit GEOS data | -- | November 9, 2012 | -- |
| Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 2 (addressing USEPA's December 13, 2012 comments) | January 2013 | February 20, 2013 ¹ | March 6, 2013 (approved) |
| Submit RI Report – Revision 0 | June 25, 2013 ² | -- ² | |
| Submit Alternatives Array Technical Memo to USEPA | August 26, 2013 ² | -- ² | |

- 1 Date was revised due to USEPA's request for additional data, data approved by USEPA on February 19, 2013
- 2 Submittal of RI Report – Revision 0 and Alternatives Array Technical Memo assumed the sediment investigation would be complete in March 2013, as noted below the permitting process was longer than anticipated.

3.3.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2009(c)), and the USEPA-approved SSWP Addendum No 1 (2012(e)). Completed RI activities are summarized in the following table

| Task | Targeted Completion Date | Actual Completion Date |
|---|----------------------------------|------------------------------|
| Surface Water Sampling – Second Round | November 2012 | November 12, 2012 |
| Quarterly Groundwater Sampling Event | January 2013 | January 14, 2013 |
| Quarterly Groundwater and Seasonal Vapor Sampling Event | April/May 2013 | April 29, 2013 |
| Quarterly Groundwater Sampling Event | July 2013 | July 17, 2013 |
| Initiate Step II Sediment Sampling | February/March 2013 ¹ | August 26-September 24, 2013 |
| Quarterly Groundwater Sampling Event | October 2013 | October 21, 2013 |

¹ Target date of February/March 2013 assumed the permits would be obtained within 90 days of submitting application. Permits were submitted in early February 2013 and received August 9, 2013

3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2012 | November 13, 2012 |
| November 2012 | December 13, 2012 |
| December 2012 | January 15, 2013 |
| January 2013 | February 15, 2013 |
| February 2013 | March 14, 2013 |
| March 2013 | April 15, 2013 |
| April 2013 | May 14, 2013 |
| May 2013 | June 14, 2013 |
| June 2013 | July 15, 2013 |
| July 2013 | August 14, 2013 |
| August 2013 | September 16, 2013 |
| September 2013 | October 15, 2013 |

3.4 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)) The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009(e)) Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. No scoping meetings or conference calls were held during this reporting period.

3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|--------------------------|--------------------------------|--------------------------|
| Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 1 (addressing USEPA's October 11, 2012 comments) | November 2012 | November 26, 2012 | December 13, 2012 |
| Resubmit GEOS data | -- | November 9, 2012 | -- |
| Submit Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 2 (addressing USEPA's December 13, 2012 comments) | January 2013 | February 20, 2013 ¹ | March 6, 2013 (approved) |

1 Date was revised due to USEPA's request for additional data, data approved by USEPA on February 19, 2013

3.4.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 2 (2011(d))
Completed RI activities are summarized in the following table.

| Task | Targeted Completion Date | Actual Completion Date |
|---|--------------------------|--------------------------------|
| Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation, groundwater and soil vapor sampling) | November/December 2012 | November 7 – December 21, 2012 |
| Surface Water Sampling – Second Round | November 2012 | November 12, 2012 |
| Second Quarterly Groundwater Sampling Event | March 2013 | March 18, 2013 |
| Third Quarterly Groundwater Sampling Event | June 2013 | June 18, 2013 |
| Second Soil Gas Sampling Event | June 2013 | July 17, 2013 ¹ |
| Initiate Step II Sediment Sampling | October 2013 | September 25, 2013 |
| Fourth Quarterly Groundwater Sampling Event | October 2013 | October 2-4, 2013 |

1 Completion of the second soil gas sampling event was postponed due to rain

3.4.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2011 | November 9, 2011 |
| November 2011 | December 12, 2011 |
| December 2011 | January 11, 2012 |
| January 2012 | February 10, 2012 |
| February 2012 | March 11, 2012 |
| March 2012 | April 10, 2012 |
| April 2012 | May 10, 2012 |
| May 2012 | June 8, 2012 |
| June 2012 | July 11, 2012 |
| July 2012 | August 10, 2012 |
| August 2012 | September 11, 2012 |
| September 2012 | October 11, 2012 |

3.5 North Station OU (North Branch Site)

The Project Start Date for the North Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). The start date was established as June 15, 2011 as summarized in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of North Station OU site-specific documents. The scoping meetings held are summarized in the following table:

| Topic | Date |
|---------------------|--------------------|
| RI Progress Meeting | September 26, 2013 |

3.5.1 Planning Documents and Work Plan Submittals

No planning documents or work plans were submitted during this reporting period.

3.5.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2012(p))
Completed RI activities are summarized in the following table

| Task | Targeted Completion Date | Actual Completion Date |
|--|--------------------------|------------------------------------|
| Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation, groundwater and soil vapor sampling on Division LLC and LaSalle Chestnut parcels) | March/April 2013 | May 14 - October 2013 ¹ |
| First Groundwater Sampling Event – Division LLC Parcel | -- | July 2013 |
| Second Groundwater Sampling Event – Division LLC Parcel and First Groundwater Sampling Event for remaining wells | -- | September 13-23, 2013 |
| Surface Water Sampling – First Round and sediment physical characterization | November 2012 | November 12, 2012 |
| Hydrographic Survey | December 2012 | January 30-31, 2013 |
| Initiate Step I Sediment Sampling | January/February 2013 | -- ² |

1 Access in the City Right-of-Way is restricted due to utilities. Access agreements are in process with ComEd and Old Town Village West.

2 Step I Sediment Sampling was assumed to be concurrent with Division Street Station and Willow Street-Hawthorne Avenue Station OU Step II Sampling. As discussed above the permit process delayed these events

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2011 | November 9, 2011 |
| November 2011 | December 12, 2011 |
| December 2011 | January 11, 2012 |
| January 2012 | February 10, 2012 |
| February 2012 | March 11, 2012 |
| March 2012 | April 10, 2012 |
| April 2012 | May 10, 2012 |
| May 2012 | June 8, 2012 |
| June 2012 | July 11, 2012 |
| July 2012 | August 10, 2012 |
| August 2012 | September 11, 2012 |
| September 2012 | October 11, 2012 |

3.6 Crawford Station

As previously discussed, PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address portions of the site that had MGP residuals at the surface and were accessible for removal. The Time Critical Removal is proceeding under AOC V-W-11-C-981 and, therefore, is not summarized in detail in this report which addresses the RI/FS activities

The Project Start Date for the Crawford Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (October 31, 2008). The start date was established as December 16, 2011 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Due to the size and multiple property owners at Crawford Station, the site will be subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups will be mutually identified with USEPA and IBS and may be selected based on access, adjacent parcels, or other criterion. Parcel Groups will range in area. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Crawford Station OU site-specific documents. The scoping meetings held are summarized in the following table.

| Topic | Date |
|---|---------------|
| Site Access Issues, RI Schedule, USEPA Comments on SSWP Parcel Group II, and Removal Action on Parcel L | July 23, 2013 |

3.6.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|--------------------------|------------------------|-----------------------------|
| Submit Response to Comments to USEPA's September 4, 2012 Comments on Group I SSWP Revision 1 | October 19, 2012 | October 19, 2012 | December 5, 2012 (approved) |
| Submit Group II SSWP Revision 0 | March 15, 2013 | April 5, 2013 | July 11, 2013 |
| Submit Response to Comments to USEPA's July 11, 2013 Comments on Group II SSWP Revision 0 | September 6, 2013 | September 6, 2013 | — |

3.6.2 Remedial Investigation Field Activities

Parcel Group II RI field investigation activities were targeted to be contracted in July and initiated in September 2013, assuming USEPA approval of the SSWP in July 2013. However, USEPA approval of the Parcel Group II SSWP is pending following IBS's submittal of a response to comments letter dated September 6, 2013 (2013(h)). A schedule for RI/FS field investigation activities will be established following USEPA's final approval of the Parcel Group II SSWP.

RI field activities were performed in Parcel Group I in accordance with USEPA-approved Group I SSWP – Revision 1 (2012(ag)). Completed RI activities are summarized in the following table.

| Task | Targeted Completion Date | Actual Completion Date |
|--|--------------------------|------------------------|
| Upland RI Parcel Group I – Parcels K, O, and P (soil borings and groundwater monitoring well installation) | March 2013 ¹ | September 9, 2013 |

¹ Assumed USEPA approval of Parcel Group I SSWP in November 2012

3.6.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2012 | November 9, 2012 |
| November 2012 | December 10, 2012 |
| December 2012 | January 10, 2013 |
| January 2013 | February 11, 2013 |
| February 2013 | March 11, 2013 |
| March 2013 | April 11, 2013 |
| April 2013 | May 10, 2013 |
| May 2013 | June 11, 2013 |
| June 2013 | July 11, 2013 |
| July 2013 | August 9, 2013 |
| August 2013 | September 11, 2013 |
| September 2013 | October 11, 2013 |

3.7 Throop Street Station

The Project Start Date for the Throop Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as June 20, 2012 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Throop Street Station OU site-specific documents. No scoping meetings were held for the Throop Street Station OU during this reporting period.

3.7.1 Planning Documents and Work Plan Submittals

No planning documents or work plans were submitted during this reporting period. However, the SSWP-Revision 0 was approved on December 4, 2012, as summarized below.

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|--------------------------|------------------------|-----------------------------|
| Submit SSWP – Revision 0 and Response to USEPA's August 1, 2012 Completion Report Comments | October 29, 2012 | October 15, 2012 | December 4, 2012 (approved) |

3.7.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 0 (2012(af))
 Completed RI activities are summarized in the following table

| Task | Targeted Completion Date | Actual Completion Date |
|--|--------------------------|-------------------------------|
| Initiate Upland RI (soil borings, groundwater monitoring well and soil vapor probe installation) | April 2013 | October 22, 2013 ¹ |

¹ Site access agreements to perform the upland RI activities were executed in September 2013, resulting in a delayed start date

3.7.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| October 2012 | November 13, 2012 |
| November 2012 | December 13, 2012 |
| December 2012 | January 11, 2013 |
| January 2013 | February 13, 2013 |
| February 2013 | March 14, 2013 |
| March 2013 | April 1, 2013 |
| April 2013 | May 14, 2013 |
| May 2013 | June 14, 2013 |
| June 2013 | July 15, 2013 |
| July 2013 | August 14, 2013 |
| August 2013 | September 16, 2013 |
| September 2013 | October 15, 2013 |

3.8 Hough Place Station OU (South Branch Site)

The Project Start Date for the Hough Place Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as February 15, 2013 as summarized in the 2012 Annual Progress Report and Master Schedule Update (2012(ai)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Hough Place Station OU site-specific documents. The scoping meetings held are summarized in the following table.

| Topic | Date |
|--|--------------------|
| Pre-Scoping Completion Report with SSWP Scoping Meeting | January 17, 2013 |
| Discuss Draft Responses to USEPA Comments for Completion Report with SSWP – Revision 1 | September 24, 2013 |

3.8.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|--|--------------------------|-----------------------------|-----------------------------|
| Submit Completion Report with SSWP – Revision 0 | February 15, 2013 | March 15, 2013 ¹ | June 3, 2013 |
| Submit Response to USEPA's June 3, 2013 Comments on Completion Report with SSWP – Revision 0 and Submit Completion Report with SSWP – Revision 1 | July 18, 2013 | July 17, 2013 | August 28, 2013 |
| Submit Addendum to Completion Report with SSWP – Revision 1 to USEPA | October 2013 | September 27, 2013 | October 30, 2013 (approved) |

¹ Submittal date was postponed to resolve format of combined Completion Report and SSWP

3.8.1 Remedial Investigation Field Activities

No remedial investigation field activities were performed during this reporting period

3.8.2 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| March 2013 | April 1, 2013 |
| April 2013 | May 14, 2013 |
| May 2013 | June 14, 2013 |
| June 2013 | July 15, 2013 |
| July 2013 | August 14, 2013 |
| August 2013 | September 16, 2013 |
| September 2013 | October 15, 2013 |

3.9 Pitney Court Station (South Branch Site)

The Project Start Date for the Throop Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as January 10, 2014 as summarized in the 2012 Annual Progress Report and Master Schedule Update (2012(a)). However, the Pitney Court Station was initiated in lieu of the North Shore Avenue Station. The North Shore Avenue Station start date was established as July 12, 2013. The Pitney Court Station start date was delayed to August 30, 2013 to allow USEPA additional time to comment on the format of the Hough Place Station OU, which was the first site to proceed with a combined Completion Report with SSWP.

Per the SOW, scoping meetings and conference calls may be used to discuss the content of Pitney Court Station site-specific documents. The scoping meetings held are summarized in the following table:

| Topic | Date |
|---|--------------------|
| Site Overview and Multi-Site Approach Meeting | September 24, 2013 |

3.9.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table

| Task/Submittal | Targeted Completion Date | Actual Completion Date | USEPA Comments Received |
|---|--------------------------|------------------------|-------------------------|
| Submit Completion Report with SSWP – Revision 0 | August 30, 2013 | August 30, 2013 | — |

3.9.2 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

| Monthly Progress Report | Submittal Date |
|-------------------------|--------------------|
| August 2013 | September 16, 2013 |
| September 2013 | October 15, 2013 |

3.10 Remaining PGL Sites

As discussed above, a project start date was established in the 2012 Annual Progress Report and Master Schedule Update Report (2012(a)) for the Pitney Court Station as January 10, 2014 but Pitney Court Station was initiated in lieu of North Shore Avenue Station (original start date of July 12, 2013)

Additional project start dates for the remaining sites were not established in the 2012 Annual Progress Report and Master Schedule Update Report for this reporting period. Project start dates for remaining sites (North Shore Avenue, 22nd Street Station OU, and South Branch River OU) are discussed in Section 4.

4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. The South Station Upland OU, Division Street Station OU, Willow Street – Hawthorne Avenue Station OU, and North Station OU, Crawford Station, Throop Station OU, and Pitney Court Station have been initiated.

Future submittals and/or activities are dependent on USEPA comments and approvals. The site-specific schedules presented in the SSOWs or supplemental RI activities, are updated herein to provide proposed site-specific schedules for field activities and major deliverables. A proposed schedule North Shore Avenue Station, 22nd Street Station OU and South Branch River OU is presented herein for major deliverables. As discussed in Section 3.10, Project Start Dates for remaining PGL sites are to be established.

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or IBS. Specific progress meeting dates are not proposed at this time.

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents may be issued, as appropriate, to update programmatic procedures or approaches.

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSOWs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., SSOWs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of

USEPA comments, etc). For planning purposes, it is assumed USEPA will provide comments within 60 days of submittals for Revision 0 and provide approvals within 45 days of receiving Revision 1.

The proposed schedules are subject to change. Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications.

4.3.1 South Station Upland OU (South Branch Site)

The tasks provided in the South Station Upland OU SSWP – Revision 1, dated January 26, 2009 (2009(a)), have been completed up to submittal of the RI Report – Revision 0.

Supplemental RI field activities are anticipated to address potential vapor intrusion. These tasks and on-going post RI groundwater monitoring are presented in Figure 1 and summarized in the following table.

| Task/Deliverable | Target Date for Completion |
|--|---|
| Monthly Progress Reports | 15 th of every month |
| Submit Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 0 (assumes groundwater plume is fully defined) | November 15, 2013 |
| Supplemental RI Field Activities (assumes USEPA approval of Supplemental RI Technical Memorandum – Vapor Intrusion, Revision 0 by mid December 2013) | Install Soil Gas Probes – January 2014 Soil Gas Sampling Event 1 – January 2014 Soil Gas Sampling Event 2 – July 2014 |
| Submit RI Report – Revision 0 to USEPA (assumes no additional RI activities are identified) | October 20, 2014 |
| Alternatives Array Tech Memo to USEPA | December 19, 2014 |
| FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early February 2015) | April 3, 2015 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data Preliminarily proposed as semi-annual |

4.3.2 Division Street OU (North Branch Site)

The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009(f)), the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)) and supplemental RI field activities have been completed in the upland area, Step I Sediment Sampling and a

portion of Step II Sediment Sampling The need for additional supplemental RI field activities will be evaluated following review of RI data (soil sampling, additional groundwater monitoring wells, and soil vapor probes)

Major deliverable target dates are presented on Figure 1 and summarized in the following table

| Task/Deliverable | Target Date for Completion |
|---|--|
| Monthly Progress Reports | 15 th of every month |
| Supplemental RI Field Activities - Upland | None anticipated |
| RI Field Activities - Sediment adjacent to Division Street OU | December 2013 |
| Submit RI Report – Revision 0 to USEPA | June 13, 2014 |
| Alternatives Array Tech Memo to USEPA | August 12, 2014 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo mid October 2014) | November 27, 2014 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data Preliminarily proposed quarterly |

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011(d)) and conditionally approved on August 30, 2011. The tasks provided in the Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 (2011(d)) and the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)), related to the upland areas, Step I Sediment Sampling and a portion of Step II Sediment Sampling have been completed

Major deliverable target dates are presented on Figure 1 and summarized in the following table

| Task/Deliverable | Target Date for Completion |
|--|--|
| Monthly Progress Reports | 15 th of every month |
| Supplemental RI Field Activities – Upland | None anticipated |
| RI Field Activities - Sediment adjacent to Willow Street-Hawthorne Avenue Station OU | December 2014 |
| Submit RI Report – Revision 0 to USEPA | June 13, 2014 |
| Alternatives Array Tech Memo to USEPA | August 12, 2014 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in mid October 2014) | November 27, 2014 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data |

4.3.4 North Station OU (North Branch Site)

The North Station OU SSWP – Revision 1 was submitted to USEPA on November 28, 2011 (2011(f)) and approved by USEPA on March 20, 2012 (2012(h)). An update to modify the sampling parameters was submitted on June 25, 2012 (2012(p)). Major deliverable target dates are presented on Figure 1 and summarized in the following table

| Task/Deliverable | Target Date for Completion |
|--|---|
| Monthly Progress Reports | 15 th of every month |
| RI Field Activities – Upland (assumes access agreements are in place December 2013) | Continued Soil Boring Installation/Sampling – January 2014 Continued Groundwater Monitoring Well Installation – January 2014 Continued Soil Gas Probe Installation – January 2014 Quarterly RI Groundwater Monitoring –through September 2014) |
| RI Field Activities - Sediment adjacent to North Station OU | Step I Sediment Sampling (as discussed in the RAF) – December 2013 |

| Task/Deliverable | Target Date for Completion |
|--|--|
| | Step II Sediment Sampling (as discussed in the RAF) – if necessary, July 2014 (assumes scope is defined June 2014) |
| Submit RI Report – Revision 0 to USEPA | January 26, 2015 |
| Alternatives Array Tech Memo to USEPA | March 27, 2015 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in May 2015) | July 10, 2015 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data |

4.3.5 Crawford Station

The project start date for Crawford Station was established as December 15, 2011. A Completion Report (2011(I)) for the entire Crawford Station site has been prepared and submitted to USEPA. Due to the size and multiple property owners at Crawford Station, a phased approach to the RI/FS activities has been proposed and approved by USEPA. Accordingly, the initial SSWP has been prepared to reflect four groups of parcels that will be investigated in a sequential manner during the RI/FS. The Parcel Group 1 SSWP – Revision 1 (2012(ag)) has been submitted and initiated. The Parcel Group 2 SSWP is currently being reviewed by USEPA and final approval is pending. Site specific work plans addressing each of the other parcel groups (Groups III through IV) will be submitted as addenda to the SSWP.

Proposed target dates for future RI/FS activities, are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

| Task/Deliverable | Target Date for Completion |
|---|---|
| Monthly Progress Reports | 15 th of every month starting in January 2012 |
| RI Field Activities – Upland Parcel Group 1 | Continued Soil Boring Installation/Sampling – November 2013 Continued Groundwater Monitoring Well Installation – December 2013 Continued Soil Gas Probe Installation – December 2013 Quarterly RI Groundwater Monitoring – through October 2014) |

| Task/Deliverable | Target Date for Completion |
|--|----------------------------|
| Submit Parcel Group 1 RI Report – Revision 0 to USEPA | January 4, 2015 |
| Parcel Group 1 Alternatives Array Tech Memo to USEPA | March 5, 2015 |
| Submit Parcel Group 1 FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in May 2015) | June 18, 2015 |
| Submit Parcel Group 2 SSWP Addendum – Revision 1 to USEPA (assumes USEPA comments on Parcel Group 2 SSWP Addendum Revision 0 early December 2013) | February 3, 2014 |
| Initiate Parcel Group 2 RI Field Work | May 2014 |
| Submit Parcel Group 3 RI Report – Revision 0 to USEPA | August 14, 2014 |

4.3.6 Throop Station OU (South Branch Site)

The project start date for the Throop Station OU (South Branch Site) was established as June 20, 2012. A proposed schedule was developed as part of the SSWP – Revision 0, submitted October 15, 2012 (2012(af)). USEPA approved SSWP – Revision 0 on December 4, 2012. Access negotiations have been resolved and the RI field investigation activities were initiated on October 22, 2013.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.

| Task/Deliverable | Target Date for Completion |
|---|---|
| Monthly Progress Reports | 15 th of every month |
| Initiate RI Field Work | October-November 2013 – soil borings, groundwater monitoring well and soil gas probe installation Quarterly RI Groundwater Monitoring – through August 2014) |
| Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required) | December 5, 2014 |

| Task/Deliverable | Target Date for Completion |
|--|--|
| Alternatives Array Tech Memo to USEPA | February 3, 2015 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in April 2015) | May 21, 2015 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data |

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) was established as March 15, 2013. The Completion Report with SSWP – Revision 1 was approved by USEPA on October 30, 2013.

Major deliverable target dates are presented on Figure 1 and summarized in the following table

| Task/Deliverable | Target Date for Completion |
|---|---|
| Monthly Progress Reports | 15 th of every month |
| Initiate RI Field Work (site access agreements assumed final in December 2013) | March 2014 – soil borings, groundwater monitoring well and soil gas probe installation Quarterly RI Groundwater Monitoring – through January 2015) |
| Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required) | April 20, 2015 |
| Alternatives Array Tech Memo to USEPA | June 19, 2015 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in August 2015) | October 2, 2015 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data |

4.3.8 Pitney Court Station (South Branch Site)

The project start date for the Pitney Court Station OU (South Branch Site) was established as August 30, 2013. The Completion Report with SSWP – Revision 0 was submitted August 30, 2013 and is currently under USEPA review

Major deliverable target dates are presented on Figure 1 and summarized in the following table, assuming USEPA approval of the Completion Report with SSWP – Revision 0 by November 27, 2013

| Task/Deliverable | Target Date for Completion |
|--|--|
| Monthly Progress Reports | 15 th of every month |
| Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed by November 27, 2013) | April-May 2014 – soil borings, groundwater monitoring well and soil gas probe installation Quarterly RI Groundwater Monitoring – through February 2015) |
| Submit RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required) | June 1, 2015 |
| Alternatives Array Tech Memo to USEPA | July 31, 2015 |
| Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in September 2015) | November 13, 2015 |
| On-going Post RI Groundwater Monitoring | To be determined following review of RI Data |

4.3.9 22nd Street Station OU (South Branch Site)

The project start date for the 22nd Street Station OU (South Branch Site) is proposed as March 17, 2014. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

| Task/Deliverable | Target Date for Completion |
|--|--|
| Monthly Progress Reports | 15 th of every month starting in May 2014 |
| Submit Completion Report – Revision 0 to USEPA (Project Start Date) | March 17, 2014 |
| Submit SSWP – Revision 0 to USEPA | June 16, 2014 |
| Submit SSWP – Revision 1 to USEPA (assumes USEPA comments on SSWP Revision 0 are received in July 2014) | September 15, 2014 |
| Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed by mid October 2014) | December 2014 |

4.3.10 North Shore Avenue Station

The project start date for the North Shore Avenue Station is proposed as June 19, 2014. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

| Task/Deliverable | Target Date for Completion |
|--|---|
| Monthly Progress Reports | 15 th of every month starting in August 2014 |
| Pre-Scoping Meeting with USEPA | March 21, 2014 |
| Submit Completion Report/SSWP – Revision 0 to USEPA (Project Start Date) | June 19, 2014 |
| Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in November 2014) | January 2015 |

4.3.1 South Branch River OU

The project start date for the South Branch River OU is proposed December 18, 2014. Proposed target dates, after submittal of the Completion Report (summarized below), are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals and the expedited process identified.

| Task/Deliverable | Target Date for Completion |
|--|--|
| Monthly Progress Reports | 15 th of every month starting in February 2015 |
| Submit Completion Report/ Assessment – Revision 0 to USEPA (Project Start Date) | December 18, 2014 |
| Initiate RI Field Work (to be provided in SSWP, USEPA approval assumed in August 2015) | August 2015 – permitting October 2015 – initiate field activities |

5 REFERENCES

- 2007(a) August 2, 2007 Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2007(b) August 5, 2007 Revision 0, Generalized Conceptual Site Model, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2007(c) September 4, 2007 Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2007(d) September 5, 2007 Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Former Manufactured Gas Plant Sites
- 2008(a) May 13, 2008, Burns and McDonnell, Completion Report, South Station Upland Operable Unit, Chicago, Illinois.
- 2008(b) September 8, 2008. Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Gas Plant Sites.
- 2008(c) October 31, 2008. United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois* U S EPA Region 5, CERCLA Docket No V-W-08-C-917
- 2009(a) January 26, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 1, South Station Upland Operable Unit, Chicago, Illinois
- 2009(b) July 16, 2009. Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2009(c) September 21, 2009. Burns and McDonnell, Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2009(d) October 6, 2010. United States Environmental Protection Agency Email Regarding Hold on Scoping Meetings/Delaying Throop Street Station Start Date.
- 2009(e) November 2, 2009. Burns and McDonnell, 2008 to 2009 Annual Progress Report, South Branch Site and North Branch Site, Chicago, Illinois, The Peoples Light, Gas and Coke Company.
- 2009(f) September 21, 2009 Burns and McDonnell, Site-Specific Work Plan, Revision 1, Division Street Station Operable Unit, Chicago, Illinois

- 2010(a) March 17, 2010 United States Environmental Protection Agency. Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(b) March 24, 2010 United States Environmental Protection Agency. Email Regarding Revised Schedule Request – South Station Approval.
- 2010(c) March 26, 2010 Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys
- 2010(d) April 20, 2010. United States Environmental Protection Agency Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.
- 2010(e) June 3, 2010. United States Environmental Protection Agency Comments on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(f) July 6, 2010. Natural Resource Technology, Inc. Response to USEPA Comments dated June 3, 2010 on Site-Specific Work Plan, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(g) July 8, 2010. Natural Resource Technology, Inc. Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(h) August 19, 2010 United States Environmental Protection Agency Additional Comments on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois
- 2010(i) July 8, 2010 United States Environmental Protection Agency. Comments on Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(j) September 20, 2010 Natural Resource Technology, Inc Response to USEPA Additional Comments dated August 19, 2010 on Site-Specific Work Plan, Revision 0, Willow Street – Hawthorne Avenue Station Operable Unit, Chicago, Illinois.
- 2010(k) September 27, 2010 Natural Resource Technology, Inc Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No V-W-08-C-917
- 2010(l) September 30, 2010 United States Environmental Protection Agency. Approval of Supplement to Characterization of Ambient Conditions in the Chicago River Upstream of the North Branch MGP Sites Technical Memorandum (rev. 9/27/10), Chicago, Illinois, Peoples Gas and Light Company CERCLA Docket No V-W-08-C-917
- 2010(m) October 7, 2010 Natural Resource Technology, Inc Response to USEPA's Comments (dated September 7, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois

- 2010 (n) October 28, 2010, Natural Resource Technology, Inc. 2010 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.
- 2010(o) November 9, 2010. United States Environmental Protection Agency. Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(p) December 23, 2010. Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated November 9, 2010) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2010(q) January 21, 2011 United States Environmental Protection Agency Additional Comments on the Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois
- 2010(r) February 21, 2011. Natural Resource Technology, Inc. Response to USEPA's Additional Comments (dated January 21, 2011) Technical Memorandum for Supplemental RI Field Work – Vapor Intrusion, Revision 0, South Station Operable Unit, Chicago, Illinois.
- 2011(a) April 18, 2011 Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 1, Chicago, Illinois
- 2011(b) April 20, 2011. Exponent, Multi-Site Risk Assessment Framework Addendum, Former Manufactured Gas Plant Sites, North Shore Gas Company CERCLA Docket No. V-W-07-C-877, Peoples Gas Light and Coke Co CERCLA Docket No. V-W-08-C-917, Wisconsin Public Service Corporation CERCLA Docket No. V-W-06-C-847
- 2011(c) June 15, 2011 Natural Resource Technology, Inc. Completion Report, North Station Operable Unit, Revision 0, Chicago, Illinois
- 2011(d) July 15, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, Willow Street/Hawthorne Avenue Station Operable Unit, Revision 2, Chicago, Illinois.
- 2011(e) August 31, 2011. Natural Resource Technology, Inc. Site-Specific Work Plan, North Station Operable Unit, Revision 0, Chicago, Illinois
- 2011 (f) September 13, 2011. United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Modification of Settlement Agreement and Administrative Order on Consent for Remedial Investigations and Feasibility Studies at Four Peoples Gas MGP Sites in Chicago, Illinois* U S EPA Region 5, CERCLA Docket No. V-W-08-C-917
- 2011 (g) October 13, 2011 United States Environmental Protection Agency and Peoples Gas Light and Coke Company, *Settlement Agreement and Administrative Order on Consent for Removal Action at Crawford Station MGP Sites in Chicago, Illinois* U S. EPA Region 5, CERCLA Docket No. V-W-11-C-981
- 2011 (h) October 28, 2011 Natural Resource Technology, Inc. 2011 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0.

- 2011(i) November 2, 2011 United States Environmental Protection Agency Comments on Preliminary RI Results for Division Street Station OU
- 2011(j) November 28, 2011 Natural Resource Technology, Inc Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2011 (k) December 19, 2011 Natural Resource Technology, Inc Response to USEPA's Comments on Preliminary RI Results for Division Street Station OU Chicago, Illinois
- 2011 (l) December 23, 2011 Natural Resource Technology, Inc Completion Report – Revision 0, Crawford Station. Chicago, Illinois
- 2012(a) January 26, 2012. United States Environmental Protection Agency Additional Comments on Preliminary RI Results for Division Street Station OU
- 2012(b) January 26, 2012 United States Environmental Protection Agency Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2012 (c) February 27, 2012 United States Environmental Protection Agency Comments on Completion Report – Revision 0, Crawford Station Chicago, Illinois.
- 2012 (d) March 12, 2012 Natural Resource Technology, Inc Response to USEPA's Additional Comments (dated January 26, 2012) on Preliminary RI Results for Division Street Station OU Chicago, Illinois.
- 2012 (e) March 12, 2012 Natural Resource Technology, Inc Site-Specific Work Plan Addendum No 1 – Revision 0 for Upland Areas, Division Street Station OU. Chicago, Illinois
- 2012(f) March 12, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2012 (g) March 14, 2012 Natural Resource Technology, Inc Parcel Group 1 Site-Specific Work Plan - Revision 0, Crawford Station Chicago, Illinois
- 2012(h) March 20, 2012 United States Environmental Protection Agency Approval of Site-Specific Work Plan, North Station Operable Unit, Revision 1, Chicago, Illinois
- 2012 (i) March 21, 2012 United States Environmental Protection Agency Comments on Site-Specific Work Plan Addendum No 1 – Revision 0 for Upland Areas, Division Street Station OU Chicago, Illinois
- 2012 (j) April 3, 2012 Natural Resource Technology, Inc Response to USEPA Comments on Parcel Group 1 Completion Report - Revision 0, Crawford Station Chicago, Illinois
- 2012 (k) May 7, 2012 Natural Resource Technology, Inc Response to USEPA Comments on Site-Specific Work Plan Addendum No 1 – Revision 0 for Upland Areas, Division Street Station OU Chicago, Illinois

- 2012 (l) May 10, 2012 United States Environmental Protection Agency Additional Comments on Site-Specific Work Plan Addendum No 1 – Revision 0 for Upland Areas, Division Street Station OU Chicago, Illinois
- 2012 (m) May 22, 2012 United States Environmental Protection Agency Comments on Parcel Group 1 Site-Specific Work Plan - Revision 0, Crawford Station Chicago, Illinois
- 2012 (n) June 20, 2012 Natural Resource Technology, Inc Completion Report – Revision 0, Throop Street Station Upland OU Chicago, Illinois.
- 2012 (o) June 25, 2012 Natural Resource Technology, Inc. Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois
- 2012 (p) June 25, 2012 Natural Resource Technology, Inc Letter and Update to Site-Specific Work Plan – Revision 1 Regarding Sampling Parameters, North Station OU Chicago, Illinois.
- 2012 (q) July 10, 2012 United States Environmental Protection Agency Acknowledgement of Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, Willow Street-Hawthorne Avenue Station OU Chicago, Illinois
- 2012 (r) July 10, 2012 United States Environmental Protection Agency Acknowledgement of Letter and Update to Site-Specific Work Plan – Revision 2 Regarding Sampling Parameters, North Station OU Chicago, Illinois
- 2012 (s) August 1, 2012 United States Environmental Protection Agency Comments on Completion Report – Revision 0, Throop Street Station Upland OU Chicago, Illinois
- 2012 (t) August 3, 2012 Natural Resource Technology, Inc. Response to USEPA Comments on Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station Chicago, Illinois
- 2012 (u) August 3, 2012 Natural Resource Technology, Inc Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station Chicago, Illinois
- 2012 (v) September 4, 2012 United States Environmental Protection Agency Comments on Division Upland Data Submittal to GEOS, Division Street Station OU Chicago, Illinois
- 2012 (w) September 4, 2012 United States Environmental Protection Agency Comments on Response to USEPA Comments of Parcel Group 1 Site-Specific Work Plan - Revision 0 and Site-Specific Work Plan – Revision 1, Crawford Station Chicago, Illinois.
- 2012 (x) September 5, 2012 Natural Resource Technology, Inc. Revised Vapor Intrusion Update to Site - Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois
- 2012 (y) September 13, 2012 United States Environmental Protection Agency Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU. Chicago, Illinois

- 2012 (z) September 13, 2012 United States Environmental Protection Agency Comments on August 30, 2012 Pre-Site Specific Work Plan Scoping Meeting, Throop Street Station Upland OU Chicago, Illinois.
- 2012 (aa) September 19, 2012 Natural Resource Technology, Inc Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU) Chicago, Illinois
- 2012 (ab) September 25, 2012 Natural Resource Technology, Inc Response to USEPA Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU Chicago, Illinois.
- 2012 (ac) October 11, 2012 United States Environmental Protection Agency Comments on Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU) Chicago, Illinois
- 2012 (ad) October 11, 2012 United States Environmental Protection Agency Comments on Division Sediment Data Submittal to GEOS, Division Street Station OU. Chicago, Illinois
- 2012 (ae) October 15, 2012 Natural Resource Technology, Inc Response to USEPA Comments on August 30, 2012 Pre-Site Specific Work Plan Scoping Meeting, Throop Street Station Upland OU Chicago, Illinois
- 2012 (af) October 15, 2012 Natural Resource Technology, Inc. Site Specific Work Plan – Revision 0, Throop Street Station Upland OU Chicago, Illinois
- 2012 (ag) October 19, 2012 Natural Resource Technology, Inc Response to USEPA's Comments on Parcel Group 1 Site-Specific Work Plan - Revision 1, Crawford Station Chicago, Illinois
- 2012 (ah) October 25, 2012 United States Environmental Protection Agency Comments on Response to USEPA Comments on Revised Vapor Intrusion Update to Site -Specific Work Plan – Revision 2, Willow Street-Hawthorne Avenue Station OU Chicago, Illinois.
- 2012 (ai) October 31, 2012 Natural Resource Technology, Inc 2012 Annual Progress Report and Master Schedule Update, Remedial Investigation/Feasibility Study, Peoples Gas Light and Coke Company, Former Manufactured Gas Plant Sites, CERCLA V-W-08-C-917, Revision 0
- 2012 (aj) November 26, 2012 Natural Resource Technology, Inc. Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 1, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU) Chicago, Illinois
- 2012 (ak) December 4, 2012 United States Environmental Protection Agency Approval of Site Specific Work Plan – Revision 0, Throop Street Station Upland OU. Chicago, Illinois.

- 2012 (al) December 5, 2012 United States Environmental Protection Agency Approval of Parcel Group I Site-Specific Work Plan - Revision 1, Crawford Station Chicago, Illinois.
- 2012 (am) December 13, 2012 United States Environmental Protection Agency Comments on Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment – Revision 1 (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU). Chicago, Illinois
- 2013 (a) February 20, 2013 Natural Resource Technology, Inc Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum – Revision 2, North Branch Sediment (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU). Chicago, Illinois
- 2013 (b) March 6, 2013 United States Environmental Protection Agency Approval on Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, North Branch Sediment – Revision 2 (Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU). Chicago, Illinois.
- 2013 (c) March 15, 2013 Natural Resource Technology, Inc Completion Report with Site-Specific Work Plan – Revision 0, Hough Place Station Operable Unit, Chicago, Illinois
- 2013 (d) April 5, 2013 Natural Resource Technology, Inc. Parcel Group II Site-Specific Work Plan - Revision 0, Crawford Station. Chicago, Illinois
- 2013 (e) June 3, 2013 United States Environmental Protection Agency Comments on Completion Report with Site-Specific Work Plan – Revision 0, Hough Place Station Operable Unit, Chicago, Illinois
- 2013 (f) July 11, 2013 United States Environmental Protection Agency Comments on Parcel Group II Site-Specific Work Plan - Revision 0, Crawford Station Chicago, Illinois
- 2013 (g) July 17, 2013 Natural Resource Technology, Inc Response to USEPA Comments on Completion Report with Site-Specific Work Plan – Revision 0 and Submit Completion Report with SSWP – Revision 1, Hough Place Station Operable Unit, Chicago, Illinois
- 2013 (h) September 6, 2013 Natural Resource Technology, Inc Response to USEPA's Comments on Parcel Group II Site-Specific Work Plan - Revision 0, Crawford Station Chicago, Illinois
- 2013 (i) August 28, United States Environmental Protection Agency Comments on Response to USEPA Comments on Completion Report with Site-Specific Work Plan – Revision 0 and Completion Report with SSWP – Revision 1, Hough Place Station Operable Unit, Chicago, Illinois
- 2013 (j) August 30, 2013 Natural Resource Technology, Inc. Completion Report with Site-Specific Work Plan – Revision 0, Pitney Court Station Operable Unit, Chicago, Illinois
- 2013 (k) September 27, 2013 Natural Resource Technology, Inc Addendum to Completion Report with Site-Specific Work Plan – Revision 1, Hough Place Station Operable Unit, Chicago, Illinois
- 2013 (l) October 30, 2013 United States Environmental Protection Agency Approval of Addendum to Completion Report with Site-Specific Work Plan – Revision 1, Hough Place Station Operable Unit, Chicago, Illinois





FIGURES

FIGURE 1
2013 Master Schedule Update - Revision 0
Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites
CERCLA Docket No. V-W-08-C-917

Date: October 31, 2013



Project: 1982 PGL MGP proposed schedule 131030
Date: Fri 11/1/13

Task

Milestone

Summary

Rollled Up Task

Rollled Up Milestone

Rollled Up Progress

Split

External Tasks

Project Summary

Group By Summary

Inactive Task

Inactive Milestone

Inactive Summary

Manual Task

Duration-only

Manual Summary Rollup

Manual Summary

Start-only

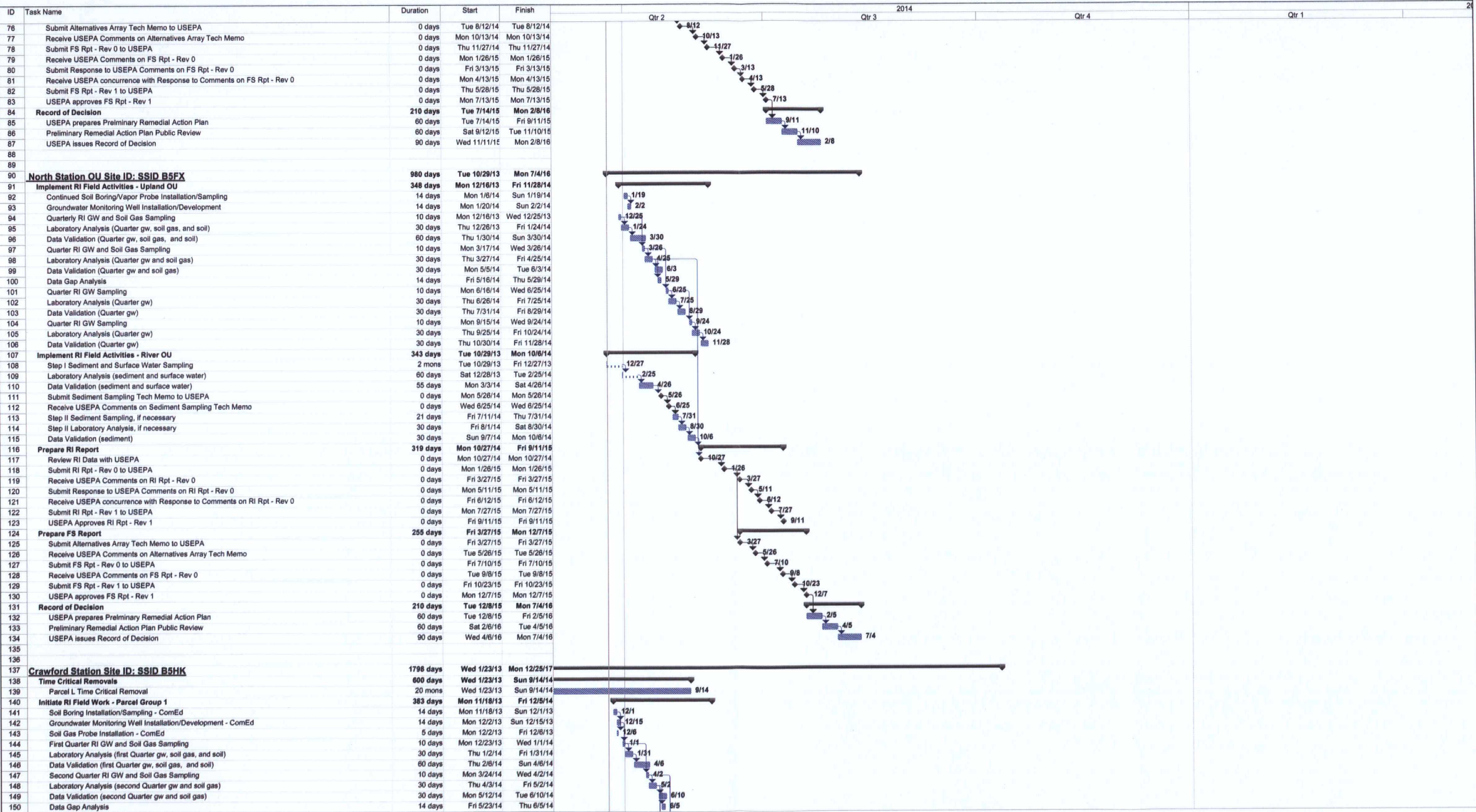
Finish-only

Progress

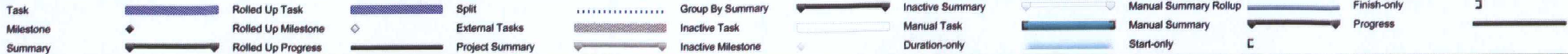
1. This preliminary schedule is dependent on USEPA-approval and weather conditions to completed field investigations.

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| | | | | | | | | | | | | |
|-----------|--|---------------------|--|-----------------|--|--------------------|--|------------------|--|-----------------------|--|-------------|
| Task | | Rolled Up Task | | Split | | Group By Summary | | Inactive Summary | | Manual Summary Rollup | | Finish-only |
| Milestone | | Rolled Up Milestone | | External Tasks | | Inactive Task | | Manual Task | | Manual Summary | | Progress |
| Summary | | Rolled Up Progress | | Project Summary | | Inactive Milestone | | Duration-only | | Start-only | | C |

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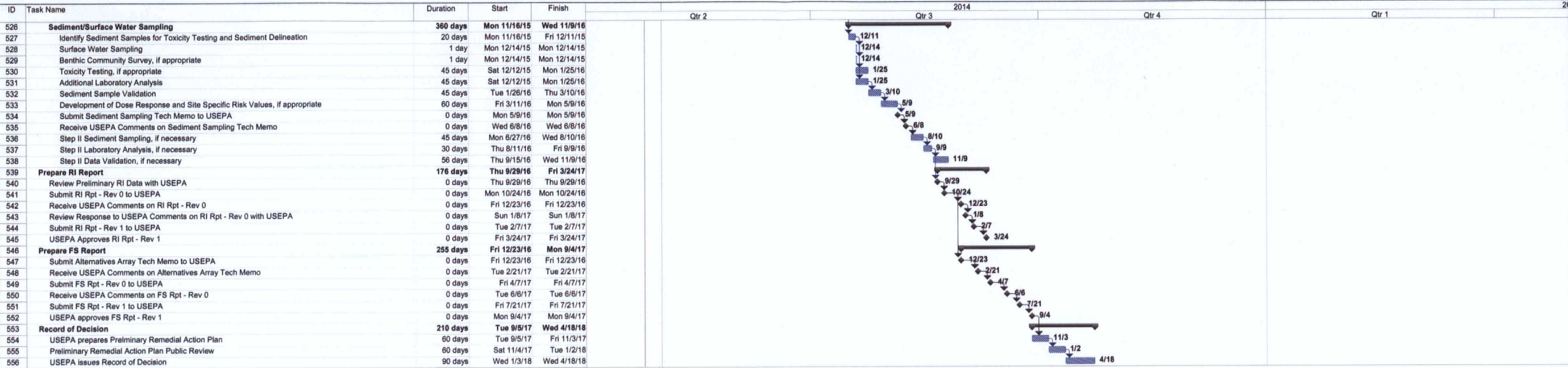
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Task

Milestone

Summary

Rolled Up Task

Rolled Up Milestone

Rolled Up Progress

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External Tasks

Project Summary

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Group By Summary

Inactive Task

Inactive Milestone

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Manual Task

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Manual Summary Rollup

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Finish-only

Progress

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